

State Water Resources Control Board

September 7, 2017

(Via email and Certified Mail)
CERTIFIED MAIL
NO. 7015 1520 0001 7928 3287

Mr. Eric Neuschmid
Chief Wastewater Plant Supervisor
City of Jackson Wastewater Treatment
33 Broadway
Jackson, California 95642
neuschmid.jackson.city@gmail.com

**SUBJECT: NOTICE OF VIOLATION; UNDERGROUND STORAGE TANK SYSTEM
LOCATED AT THE CITY OF JACKSON WASTEWATER TREATMENT
FACILITY, 39 NORTH HIGHWAY 49 AND 88, JACKSON**

Dear Mr. Neuschmid:

As part of an initiative by the State Water Resources Control Board (State Water Board) to ensure compliance at government-owned and/or operated underground storage tank (UST) facilities in California, the State Water Board staff inspected the UST at your facility on August 17, 2017, pursuant to authority under Health and Safety Code (H&SC), chapter 6.7, section 25289.

The State Water Board has identified the following violations pursuant to H&SC, chapter 6.7, and California Code of Regulations (CCR), title 23, chapter 16:

| No. | Violation | Tank | Start Date | Stop Date | Regulation |
|-----|---|--------|-----------------|-----------|---|
| 1 | Failure to Maintain Plot Plan/Site Map – An approved plot plan/site map indicating the location of the product piping, tanks, and auxiliary equipment with respect to buildings or other landmarks, such as the street, was not available in CERS or onsite at the time of the inspection. | Diesel | August 17, 2017 | Ongoing | H&SC 25286(a); 23 CCR 2711(a)(8) |
| 2 | Failure to Maintain Tank Information (Form A) – In CERS, under product piping construction, primary containment is listed as “unknown” and secondary containment is not listed. | Diesel | August 17, 2017 | Ongoing | 23 CCR 2711(a) |

| No. | Violation | Tank | Start Date | Stop Date | Regulation |
|-----|--|--------|-----------------|-----------|-------------------------------------|
| 3 | Failure to Maintain Monitoring Plan – In CERS, under piping monitoring, suction piping meets exemption criteria is listed “yes,” it should be listed as “no.” This system does not meet safe suction requirements. | Diesel | August 17, 2017 | Ongoing | H&SC 25286(a); 23 CCR 2631(d)(1) |
| 4 | Failure to Provide a Valid Board of Equalization (BOE) Number – The BOE number listed in CERS is not valid. A valid BOE number must be provided in CERS. | Diesel | August 17, 2017 | Ongoing | H&SC 25286(c)(9) |
| 5 | Failure to Maintain Financial Responsibility – The Certificate of Financial Responsibility form must be updated to include a Chief Financial Officer (CFO) letter as a mechanism type and reflect appropriate coverage amounts. Additionally, the CFO letter is out of date and must be signed by your local CFO. | Diesel | August 17, 2017 | Ongoing | H&SC 25292.2; 23 CCR 2711(a)(11) |
| 6 | Failure to Provide Designated Operator (DO) Training – Training documentation onsite shows the last employee training provided by the DO occurred March 16, 2010. This training must be provided to employees annually. | Diesel | April 1, 2011 | Ongoing | 23 CCR 2715(f) |
| 7 | Failure to Maintain DO Records Onsite – The DO monthly report for July 2017 was not onsite at the time of inspection. | Diesel | August 17, 2017 | Ongoing | 23 CCR 2715(e) |
| 8 | Failure to Perform Secondary Containment Testing – The double-walled piping between the day tank and the generator is not being tested. | Diesel | August 17, 2017 | Ongoing | 23 CCR 2637(a) |
| 9 | Failure to Monitor Product Piping – The underground piping between the day tank and the generator is not being continuously monitored. | Diesel | August 17, 2017 | Ongoing | 23 CCR 2636(f) |
| 10 | Failure to Install Approved Secondary Containment Piping – At the time of inspection, it could not be determined if the secondary containment piping installed between the day tank and the generator is approved. | Diesel | August 17, 2017 | Ongoing | 23 CCR 2631(d) |

You are directed to correct the ongoing violations and submit compliance documentation to the State Water Board and the Amador County Environmental Health within sixty (60) days from the date of this letter. Have your DO make specific notations in the next monthly DO report indicating the ongoing violations have been corrected. The monthly DO report and any associated photos must be submitted as proof of compliance.

Please send all compliance documentation to the following:

State Water Board

Mr. Douglas McDevitt
UST Enforcement Unit
Office of Enforcement
State Water Resources Control Board
801 K Street, Suite 2300
Sacramento, California 95814
douglas.mcdevitt@waterboards.ca.gov

Local CUPA

Mr. Mike Israel
Director of Environmental Health
Amador County Environmental Health
810 Court Street
Jackson, California 95642
misrael@amadorgov.org

Pursuant to Health and Safety Code, chapter 6.7, section 25299, the owner and operator of the tank(s) are liable for a penalty of \$500 to \$5,000 per tank, per day of violation. These penalties will continue to accrue until the violations have been corrected.

If you have any questions, please contact me at (916) 341-5551, or by email at amantha.henkel@waterboards.ca.gov.

Sincerely,



Amantha Henkel
Senior Environmental Scientist
UST Enforcement Unit
Office of Enforcement

cc: (via email only)

Mr. Mike Israel
Director of Environmental Health
Amador County Environmental Health
misrael@amadorgov.org

Mr. Scott Meyer
Registered Environmental Health Specialist
Amador County Environmental Health
smeyer@amadorgov.org